

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

LEMOND CYCLING, INC.,

Plaintiff,

v.

TREK BICYCLE CORPORATION,

Defendant and Third-Party
Plaintiff,

v.

GREG LEMOND,

Third-Party Defendant.

Case No. 08-CV-1010 (RHK-JSM)

TREK'S MOTION FOR
PROTECTIVE ORDER RELATED
TO PUBLIC STRATEGIES, INC.

Defendant and Third-Party Plaintiff Trek Bicycle Corporation moves under Federal Rules of Civil Procedure 26(c), 26(b)(1), and 26(b)(3)(A) for a protective order safeguarding from disclosure to the opposing parties in discovery all communications, documents, and other information shared with, and produced by, Public Strategies, Inc., a firm retained by Trek's legal counsel (Gass Weber Mullins LLC) to help develop and implement legal strategy in this matter. Trek's supporting memorandum and declaration of Ralph A. Weber further set forth the reasons supporting this motion.

Dated this 30th day of April, 2009

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